

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

AD HOC COMMITTEE OF NON-US
CUSTOMERS OF FTX.COM,

Plaintiff,

v.

FTX TRADING, LTD., *et al.*,

Defendants.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Proc. No. 22-50514 (JTD)

**NOTICE OF AGENDA FOR HEARING SCHEDULED FOR
FEBRUARY 8, 2023, AT 1:00 P.M. (ET), BEFORE THE HONORABLE JOHN T.
DORSEY AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT
OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 5TH FLOOR,
COURTROOM NO. 5, WILMINGTON, DELAWARE 19801**

**ALL PARTICIPANTS, INCLUDING ATTORNEYS INTENDING
TO PRESENT AT THE HEARING AND WITNESSES, MUST BE PHYSICALLY PRESENT
IN THE COURTROOM. ANY NON-PARTICIPANT MAY VIEW
THE HEARING VIA ZOOM BY REGISTERING IN ADVANCE AT
THE LINK BELOW BY FEBRUARY 8, 2023 AT 11:00 A.M. (ET)**

Non-participants, please use the following link to register for this hearing:

https://debuscourts.zoomgov.com/meeting/register/vJltcOqhqz0qEwmD__5Nssg1RAosYPbNIRE

**After registering your appearance by Zoom, you will receive a confirmation
email containing information about joining the hearing.**

Topic: FTX Trading Ltd., *et al.* - Case No. 22-11068 (JTD)

When: February 8, 2023 at 1:00 p.m. (ET)

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

**YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM
OR YOU WILL NOT BE ALLOWED INTO THE MEETING.**

ADJOURNED MATTERS:

1. Complaint for Declaratory Judgment [Adv. Case. 22-50514 D.I. 1, filed on December 28, 2022]

Status: The parties have extended the response deadline to the Complaint for the Debtor Defendants. This matter is adjourned to the hearing scheduled for March 8, 2023.

2. [Motion of Debtors for Entry of an Order \(I\) Authorizing and Approving Procedures for the Sale or Transfer of Certain De Minimis Assets and Fund Assets and \(II\) Approving Assumption, Assignment and Rejection Procedures and \(III\) Granting Related Relief \[D.I. 525, filed on January 18, 2023\]](#)

Status: This matter is adjourned with approval from the Court to the February 15th Hearing.

3. [Debtors' Motion to File under Seal the Supplemental Declaration of Benjamin J. Steele in Support of Debtors' Application for Entry of an Order Authorizing Employment and Retention of Kroll Restructuring Administration LLC as Administrative Advisor *Nunc Pro Tunc* to the Petition Date \[D.I. 555, filed on January 20, 2023\]](#)

Response Deadline: February 1, 2023 at 4:00 p.m. (ET); extended for the United States Trustee

Responses Received:

- A. Informal comments from the Office of the United States Trustee

Related Documents:

- A. [SEALED] Supplemental Declaration of Benjamin J. Steele in Support of Debtors' Application for Entry of an Order Authorizing Employment and Retention of Kroll Restructuring Administration LLC as Administrative Advisor *Nunc Pro Tunc* to the Petition Date [D.I. 554, filed on January 20, 2023]

- B. [Notice of Motion \[D.I. 556, filed on January 20, 2023\]](#)

Status: This matter is adjourned to a hearing to be determined at the request of the U.S. Trustee.

RESOLVED MATTERS:

4. Debtors' First Omnibus Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts Effective as of the Rejection Date [D.I. 333, filed on December 30, 2022]

Status: On January 26, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing on this matter is not required.

5. Debtors' Application for an Order (I) Authorizing the Retention and Employment of Perella Weinberg Partners LP as Investment Banker to the Debtors *Nunc Pro Tunc* to November 16, 2022 and (II) Waiving Certain Reporting Requirements Pursuant to Local Rule 2016-2(h) [D.I. 275, filed on December 21, 2022]

Status: On February 3, 2023, the Court an ordered granting the relief requested. Accordingly, a hearing on this matter is not required.

6. Motion of Debtors for Entry of an Order Authorizing the Debtors to File under Seal Debtors' Motion for Entry of an Order Pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1 Authorizing Discovery in Connection with Confidential Investigation [D.I. 581, filed on January 25, 2023]

Status: On February 3, 2023, the Court entered an Order granting the relief requested. Accordingly, a hearing on this matter is not required.

7. Motion of the Debtors for Turnover of Assets Held by Interactive Brokers [D.I. 582, filed on January 25, 2023]

Status: On February 3, 2023, the Court entered an Order granting the relief requested. Accordingly, a hearing on this matter is not required.

MATTERS GOING FORWARD:

8. Application for an Order Authorizing the Retention and Employment of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of December 22, 2022 [481, filed on January 18, 2023]

Response Deadline: January 25, 2023 at 4:00 p.m. (ET); extended to February 1, 2023 at 4:00 pm. for the United States Trustee

Responses Received:

- A. Informal comments from the Office of the United States Trustee

Related Documents:

- A. [SEALED] Application for an Order Authorizing the Retention and Employment of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of December 22, 2022 [482, filed on January 18, 2023]

Status: The Committee is working with the U.S. Trustee to resolve the U.S. Trustee's informal response prior to the hearing. To the extent the Committee does so, it will file a certification of counsel or present a consensual revised proposed order at the hearing. In the event the Committee is unable to resolve the response prior to the hearing, this matter will be adjourned to the February 15, 2023 hearing in these chapter 11 cases (subject to the Court's availability).

9. [Application for Entry of an Order, Pursuant to Sections 328, 330 and 1103 of the Bankruptcy Code, Authorizing and Approving the Retention and Employment of Paul Hastings LLP as Lead Counsel to the Official Committee of Unsecured Creditors, Effective as of December 20, 2022 \[D.I. 518, January 18, 2023\]](#)

Response Deadline: February 1, 2023 at 4:00 p.m. (ET); extended to February 3, 2023 at 4:00 pm. for the United States Trustee

Responses Received:

- A. Informal comments from the Office of the United States Trustee

Related Documents:

- A. [SEALED] Application for Entry of an Order, Pursuant to Sections 328, 330 and 1103 of the Bankruptcy Code, Authorizing and Approving the Retention and Employment of Paul Hastings LLP as Lead Counsel to the Official Committee of Unsecured Creditors, Effective as of December 20, 2022 [D.I. 519, January 18, 2023]
- B. [Notice of Filing of Corrected Exhibit C to Application for Entry of an Order, Pursuant to Sections 328, 330 and 1103 of the Bankruptcy Code, Authorizing and Approving the Retention and Employment of Paul Hastings LLP as Lead Counsel to the Official Committee of Unsecured Creditors, Effective as of December 20, 2022 \[D.I. 536, filed on January 19, 2023\]](#)

Status: The U.S. Trustee's informal comments have been resolved. The Committee will be submitting a revised form of order under certification of counsel, along with a supplemental declaration in support of the application.

10. [Application of the Official Committee of Unsecured Creditors to Retain and Employ Young Conaway Stargatt & Taylor, LLP as Co-Counsel, Effective as of December 22, 2022 \[D.I. 522, filed on January 18, 2023\]](#)

Response Deadline: February 1, 2023 at 4:00 p.m. (ET); extended for the United States Trustee

Responses Received:

- A. Informal comments from the Office of the United States Trustee

Related Documents:

- A. [SEALED] Application of the Official Committee of Unsecured Creditors to Retain and Employ Young Conaway Stargatt & Taylor, LLP as Co-Counsel, Effective as of December 22, 2022 [D.I. 523, filed on January 18, 2023]

Status: The U.S. Trustee's informal comments have been resolved. The Committee will be submitting a revised form of order under certification of counsel, along with a supplemental declaration in support of the application.

11. [Application of the Official Committee of Unsecured Creditors for Entry of an Order \(I\) Authorizing the Retention and Employment of Jefferies LLC as Investment Banker Pursuant to 11 U.S.C. §§ 328\(a\) and 1103\(a\), Effective as of December 23, 2022 and \(II\) Waiving Certain Time-Keeping Requirements \[D.I. 520, filed on January 18, 2023\]](#)

Response Deadline: February 1, 2023 at 4:00 p.m. (ET); extended for the United States Trustee

Responses Received:

- A. Informal comments from the Office of the United States Trustee

Related Documents:

- A. [SEALED] Application of the Official Committee of Unsecured Creditors for Entry of an Order (I) Authorizing the Retention and Employment of Jefferies LLC as Investment Banker Pursuant to 11 U.S.C. §§ 328(a) and 1103(a), Effective as of December 23, 2022 and (II) Waiving Certain Time-Keeping Requirements [D.I. 521, filed on January 18, 2023]

Status: The Committee is working with the U.S. Trustee to resolve the U.S. Trustee's informal response prior to the hearing. To the extent the Committee does so, it will file a certification of counsel or present a consensual revised proposed order at the hearing. In the event the Committee is unable to resolve the response prior to the hearing, this matter will be adjourned to the February 15, 2023 hearing in these chapter 11 cases (subject to the Court's availability).

12. [Motion of Official Committee of Unsecured Creditors of FTX Trading Ltd., et al., for Entry of an Order \(I\) Clarifying the Requirement to Provide Access to Confidential or Privileged Information and Approving a Protocol Regarding Creditor Requests for Information, \(II\) Authorizing the Committee to Establish and Maintain the Committee Information Platforms, and \(III\) Authorizing the Committee to Utilize Epiq Corporate Restructuring, LLC as Information Agent in Connection Therewith, Effective as of January 5, 2023 \[D.I. 575, filed on January 25, 2023\]](#)

Response Deadline: February 1, 2023 at 4:00 p.m. (ET)

Responses Received:

- A. Informal comments from the Office of the United States Trustee and the Debtors

Related Documents: None.

Status: The U.S. Trustee's and Debtors' informal comments have been resolved. The Committee will be submitting a revised form of order under certification of counsel, along with a supplemental declaration in support of the motion.

13. [Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of an Order Pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1 Authorizing Examinations \[D.I. 579, filed on January 25, 2023\]](#)

Response Deadline: February 1, 2023 at 4:00 p.m. (ET); extended for the United States Trustee to February 2, 2023 at 4:00 p.m. (ET)

Responses Received:

- A. [Limited Objection of the United States Trustee to Rule 2004 Motions \[D.I. 607, filed on February 2, 2023\]](#)

Related Documents:

- A. [Reply of the Debtors and the Official Committee of Unsecured Creditors in Support of Motions Authorizing Rule 2004 Examinations \[D.I. 619, filed on February 5, 2023\]](#)

Status: This matter is going forward.

14. [SEALED] Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1 Authorizing Discovery in Connection with Confidential Investigation [D.I. 580, filed on January 25, 2023]

Response Deadline: February 1, 2023 at 4:00 p.m. (ET); extended for the United States Trustee to February 2, 2023 at 4:00 p.m. (ET)

Responses Received:

- A. [Limited Objection of the Unites States Trustee to Rule 2004 Motions \[D.I. 607, filed on February 2, 2023\]](#)

Related Documents:

- A. [Notice of Filing of Redacted Version of Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1 Authorizing Discovery in Connection with Confidential Investigation \[D.I. 588, filed on January 27, 2023\]](#)
- B. [Order Authorizing the Debtors to File under Seal Debtors' Motion for Entry of an Order Pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1 Authorizing Discovery in Connection with Confidential Investigation \[D.I. 614, entered on February 3, 2023\]](#)
- C. [Reply of the Debtors and the Official Committee of Unsecured Creditors in Support of Motions Authorizing Rule 2004 Examinations \[D.I. 619, filed on February 5, 2023\]](#)

Status: This matter is going forward.

Dated: February 6, 2023
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce
Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

*Counsel for the Debtors
and Debtors-in-Possession*